

C - B A N D



RELOCATION PAYMENT  
CLEARINGHOUSE

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# QUARTERLY REPORT

*FOR THE PERIOD ENDING*

*SEPTEMBER 30, 2021*

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October 27, 2021

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## 1. Introduction

The Relocation Payment Clearinghouse LLC (“RPC”) oversees and administers the cost-related aspects of the C-band (3.7 to 4.2 GHz) transition. Among its duties, the RPC collects and distributes payments for the C-band transition, administers the reimbursement fund, reviews reimbursement claims for relocation costs, mitigates financial disputes among stakeholders, and administers the dispute resolution process.

The RPC provides its Quarterly Progress Report to the Federal Communications Commission (“FCC”) regarding the progress of the cost-related aspects of the C-band transition. This report summarizes the RPC’s activities undertaken from July 1, 2021 through September 30, 2021. Pursuant to the FCC’s Report and Order and Order of Proposed Modification, the RPC is required to file progress reports on a quarterly basis to facilitate the FCC’s oversight of the transition.<sup>1</sup>

## 2. Summary of the RPC’s Activities

Several significant developments in the program occurred during the third quarter of 2021. On July 23, 2021, the FCC issued licenses to 19 out of the 21 Overlay Licensees that were winning bidders in Auction 107. This enabled the RPC to begin to bill and collect funds from these Overlay Licensees for the reimbursement fund that is used for relocation cost reimbursements and for lump sum payments.

During the third quarter of 2021, the primary focus of the RPC has been to refine policies and procedures and establish systems to aid in the successful execution of the RPC’s duties and responsibilities as prescribed in the *Report and Order*. The RPC published policies and other guidance for program participants on its website ([www.CbandRPC.com](http://www.CbandRPC.com)). On July 30, 2021, the RPC published the C-band Handbook to provide program stakeholders and interested parties with information on the RPC’s policies and procedures. On August 11, 2021, the RPC published a Dispute Resolution Plan that sets forth the procedures that will be followed by the RPC in carrying out its dispute resolution obligations. The RPC published a Confidentiality Policy that establishes the procedures the RPC will follow for protecting Confidential Information from public disclosure and to facilitate the exchange of Confidential Information relevant to the evaluation of claims. The RPC also released user guides for claimants regarding how to setup a profile in Coupa and how to submit a claim and posted additional content on its website, such as frequently asked questions.

In August 2021, the RPC began accepting claims for lump sum payments and for reimbursement of C-band relocation costs. Claimants with an approved claimant profile in the RPC’s Coupa Supplier Portal (“Coupa Portal”), the RPC’s system for submitting and processing claims associated with the C-band relocation program, could submit claims. As of September 30, 2021, the RPC received 703 claims with a total dollar value of \$1,345,201,727. The RPC reviews claim submissions and supporting documentation and assesses the claim against the requirements of the *Report and Order*, and, as applicable, against a space station operator’s transition plan and the Cost Catalog, to determine the suitability of the submitted costs for reimbursement. After completing its review, the RPC includes approved and rejected claims in Record Keeping Invoices sent to Overlay Licensees. As of September 30, 2021, the RPC included 184 approved claims with a total dollar value of \$2,794,431 in two Record Keeping Invoices sent to Overlay

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<sup>1</sup> *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2450, para. 270 (2020) (“*Report and Order*”); see also 47 C.F.R. § 27.1414(c)(1).

Licensees. Although the RPC has not made any lump sum payments or payments to reimburse relocation costs as of September 30, 2021, it expects to begin making such payments in October 2021.

The RPC performed the following additional activities during the July 1, 2021 to September 30, 2021 reporting period.

#### Project Management and Communications

- Prepared Project Management Office Dashboard reports to monitor the status of open tasks, decisions, and deliverables.
- Prepared Claimant Setup and Claims Review Dashboard reports.
- Prepared presentations and participated in industry work sessions and panels to stay abreast of industry concerns and provide guidance to claimants regarding claimant profile setup and claims submission processes.
- Performed email, telephone, and mail outreach campaigns to lump sum election filers to confirm or update contact information to initiate the Coupa Portal account setup.
- Performed email and telephone outreach to assist claimants with submitting their claimant profile and claims within the Coupa Portal.
- Prepared and published training materials to guide claimants through the Coupa Portal account setup and claimant profile submission processes.
- Prepared and published training materials to guide claimants through the claim submission process via the Coupa Portal.
- Established secure SharePoint sites and document management protocols to support the claims review processes.
- Updated website to include Frequently Asked Questions, process overview diagrams, and quick reference guides.

#### Claims Reimbursement

- Continued to refine workflows, policies, and procedures to govern the execution of the RPC's responsibilities related to the claimant setup process and claims reimbursement process, specifically for Lump Sum and Cost Reimbursement claims.
- Continued to participate in working sessions with stakeholders to discuss the development of policies and procedures related to the claims reimbursement process.
- Continued to participate in monthly meetings with the C-band Technical Working Group-2 and ACA Connects to discuss the RPC's planning activities and progress and to respond to inquiries from industry members.
- Gathered data from all the lump sum election filings submitted to the FCC. Analyzed and validated this data using publicly available external sources; including the FCC's updated Lists of Incumbent Earth Stations dated 6/22/2021 and 9/15/2021.
- Continued the review of information and documentation submitted by potential claimants via Coupa to establish a Coupa profile (see Section 3. Claimant Setup Status below for details).
- Created purchase orders for lump sum election filers to aid in the submission process of submitting claims within Coupa for approved claimant profiles.
- Began accepting claims in Coupa for the claimants that have their fully completed profiles.
- Included 184 approved claims with a total dollar value of \$2,794,431 in Record Keeping Invoices sent to Overlay Licensees.

- Addressed claimants' inquiries and requests regarding the claimant setup process and claim submission process.

### Financial Management

- Confirmed *pro rata* share calculations for Overlay Licensees.
- Compiled actual and estimated costs for Space Stations, Lump Sum Transition and Clearinghouse teaming partners.
- Obtained signed "Authorization to access RPC SharePoint" form from all Overlay Licensees and granted them access to the RPC SharePoint.
- Issued First Billing Statements to Overlay Licensees.
- Collected payments from twelve (12) Overlay Licensees.
- Issued two Record Keeping Invoices to the Overlay Licensees comprised of approved Claims
- Conducted Payment Verifications (recorded via Teams) for Claimants whose Claims have been approved.
- Participated in meetings with program stakeholders to discuss RPC Agreements and obligations related to the C-band program.

### System Implementations

- Updated process flows for all areas for the Claims Reimbursement and Financial Management Teams to govern the execution of the RPC's responsibilities.
- Conducted additional testing and updates to refine Coupa designs and configurations.
- Deployed Dynamics/Coupa Interfaces for supplier information.
- Opened access to the Coupa Portal to claimants to begin submitting claims.
- Onboarded RPC personnel to support claims review and approvals within Coupa.
- Initiated reporting track for analyzing information.
- Initiated deployment of RPC Microsoft SharePoint site.

### Risk and Governance

- Finalized the Information Security Policies.
- Conducted Quality Assurance/Quality Control (QA/QC) planning, including risk assessments associated with the *Report and Order's* requirements and preparation of compliance test procedures.
- Conducted QA/QC reviews on claims submitted in Coupa.
- Provided advice and guidance on the procurement process, specifically for the evaluation of audit proposals received by the RPC.
- Conducted research and provided advice and guidance on the use of automated technologies for reporting, data analysis, and operational efficiencies.
- Launched third-party fraud reporting hotline and provided telephone, web, and mobile contact information on the RPC's website to allow stakeholders to anonymously report potential fraud, waste, and abuse, and/or administrative misconduct to the RPC.
- Drafted the RPC Anti-Fraud, Waste, and Abuse policy and procedures.
- Developed and scheduled Fraud Awareness training to be delivered to all RPC personnel.

- Began to update the RPC preliminary enterprise-wide risk assessment based on continued refinement of policies and procedures, deployment of system functionality, and implementation of internal controls.
- Reviewed and refined FISCAM and NIST requirements to be included in the internal controls review.
- Continued to review key RPC policies, procedures, plans, and other deliverables to confirm that RPC management identified relevant risks and documented appropriate risk acceptance or mitigation responses, including implementation of internal controls.

### 3. Claimant Setup Status

As of September 30, 2021, the RPC reports that it:

- Confirmed contact information and sent an invitation to 1,491 potential claimants to begin their profile setup in the Coupa Portal;
- Reviewed and approved 794 claimant profiles;
- Is in the process of reviewing 184 additional claimant profiles;
- Continued email and telephone outreach to additional 513 claimants who have been invited, but not yet submitted their profile; and
- Is confirming point of contact information for the remaining 79 lump sum filers.

### 4. Financial Information

#### 4.1. Relocation Payments Issued

Through September 30, 2021, the RPC has not made any payments to reimburse relocation costs or lump sum payments.

#### 4.2. Certifications Filed by Incumbents

Through September 30, 2021, the RPC received a Phase I Certification of Accelerated Relocation from Satélites Mexicanos S.A. de C.V. d/b/a Eutelsat Americas.

#### 4.3. Accelerated Relocation Payments Issued

The Phase I and II accelerated relocation deadlines are December 5, 2021 and December 5, 2023, respectively. Through September 30, 2021, the RPC has not made any accelerated relocation payments. The RPC has been developing policies and procedures to define the methods whereby accelerated relocation payments will be requested and reviewed to expedite the review and distribution of such payments.

#### 4.4. RPC Fees and Expenses

The RPC's Fees and Expenses are shown in Table 1. The RPC's fees consist of labor costs that are required for the RPC to carry out its duties. The labor cost categories include:

- Program Management and Communications
- Governance and Compliance
- Claims Reimbursement Activities
- Financial Management and Reporting
- Data Management

- Legal and Regulatory
- Technical Engineers/Subject Matter Experts
- Technical Advisory

**Table 1: RPC Fees and Expenses**

	Quarter Ending March 31, 2021	Quarter Ending June 30, 2021	Quarter Ending Sept. 30, 2021	Year-to-Date
<b>Fees</b>				
CohnReznick	\$1,830,980.00	\$2,449,515.00	\$4,322,200.00	\$8,602,695.00
Squire Patton Boggs	\$1,003,908.00	\$1,462,108.15	\$1,723,386.79	\$4,189,402.94
Intellicom Technologies	\$345,015.11	\$446,196.50	\$944,110.64	\$1,735,322.25
Reed Strategy	\$44,730.00	\$43,515.00	\$53,355.00	\$141,600.00
<b>Expenses</b>	\$283,052.11	\$384,390.59	\$493,708.73	\$1,161,151.43
<b>Total Fees and Expenses</b>	<b>\$3,507,685.22</b>	<b>\$4,785,725.24</b>	<b>\$7,536,761.16</b>	<b>\$15,830,171.62</b>

## 5. Disputes

The RPC published Version 1.0 of the Dispute Resolution Plan (“Plan”) on August 11, 2021. The Plan sets forth the procedures that will be followed by the RPC in carrying out its dispute resolution obligations, as set forth in the *Report and Order* and rules adopted by the FCC.

As of September 30, 2021, the RPC had not received notice of any disputes.